IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of :	)	Attorney Docket No.: 53470.003029
	)	
Jeffrey A. BEDELL *et al.*	)	Group Art Unit: 2141
	)	
Application No.: 09/883,301	)	Examiner: Chirag Patel
	)	
Filed: June 19, 2001	)	
	)	

For: METHOD AND SYSTEM FOR IMPLEMENTING DATABASE CONNECTION
MAPPING FOR REPORTING SYSTEMS

SUBMISSION OF APPEAL BRIEF

Sir:

In response to the Office Action dated February 8, 2007, appellants herein submit an

Appeal Brief in connection with the above-captioned patent application in compliance with 37

C.F.R. § 1.192 (c) along with a Petition for a One Month Extension of Time and the requisite

filing fees. Authorization is hereby granted to charge or credit the undersigned's Deposit

Account No. 50-0206 for any fees or overpayments related to the entry of this Appeal. The Pre-

Appeal Brief Conference Decision was received on November 14, 2007.

Respectfully submitted,

HUNTON & WILLIAMS LLP

Date: _Dec 21, 2007_   By: _____
                                   Brian M. Buroker
                                   Registration No. 39,125

Hunton & Williams, LLP
1900 K Street, N.W., Suite 1200
Washington, D.C. 20006-1109
Tel: (202) 955-1500
Fax: (202) 778-2201

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Application Number	09/883,301 Confirmation No.: 9724
Applicant	Jeffrey A. Bedell *et al.*
Filed	June 19, 2001
Title	METHOD AND SYSTEM FOR IMPLEMENTING DATABASE CONNECTION MAPPING FOR REPORTING SYSTEMS
TC/Art Unit	2141
Examiner:	Chirag Patel
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Customer No.	**21967**

APPEAL BRIEF

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APPEAL BRIEF

In response to the Office Action dated February 8, 2007, rejecting pending claims 1-18,

Appellants respectfully request that the Board of Patent Appeals and Interferences reconsider and

reverse the rejections of record.

I.   Real Party In Interest

The real party in interest is MicroStrategy, Incorporated as assignee of the entire interest

in the above-referenced application, assigned by its inventors.

II.   Related Appeals And Interferences

There are no known related appeals.

III.   Status Of Claims

Claims 1-5, 7-11, and 13-17 stand rejected under 35 U.S.C. § 102(e) as allegedly being

anticipated by U.S. Patent No. 7,062,563 to Lewis *et al.* ("Lewis"). Claims 6, 12, and 18 stand

rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Lewis in view of U.S. Pat.

App. Pub. No. 2001/0049717 to Freeman *et al.* ("Freeman").

The rejection of claims 1-18 is appealed.

IV.   Status Of Amendments

No amendments to the claims have been filed after the last rejection.

V.   Summary Of Claimed Subject Matter

A concise explanation of independent claims 1, 7 and 13 as well as dependent claim 2 is reproduced below, along with a citation to page number, line number, figures, and reference characters, where appropriate, to assist the Board of Patent Appeals and Interferences ("Board") in appreciating the significant advances made by the embodiments of the present invention.

A.   Concise Explanation of Independent Claim 1

Claim 1 recites a method for implementing database connection mapping for connecting a user to at least one database in a reporting system, comprising the steps of: (*see*, for example, FIGs. 1-2 and 8, page 5, ll. 21-22, page 21, line 4 to page 25, line 2)

enabling a user to submit a user identification input and a user request to a reporting system; (see, for example, FIGs. 3 and 9, page 12, line 19 to page 14, line 15, page 22, ll. 8-10, page 26, ll. 3-16)

identifying the user based on user identification input; and (see, for example, FIG. 9, page 26, line 3 to page 27, line 22)

controlling access to at least one database through a centralized server (see, for example, FIG. 8, '820,' page 21, line 15 to page 23, line 2) wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition. (see, for example, FIGs. 8-10, page 21, line 15 to page 31, line 7).

B.   Concise Explanation of Dependent Claim 2

Claim 2 recites a method of claim 1 wherein the database connection definition comprises a data source name and a set of properties for establishing a database connection to at least one database. (*See*, for example, FIGs. 3, 8; p. 3, l. 20 - p. 4, l. 1; p. 22, ll. 5 - 10).

C.   Concise Explanation of Independent Claim 7

Claim 7 recites a system for implementing database connection mapping for connecting a user to at least one database in a reporting system, comprising: (see, for example, FIGs. 1-2, 8, page 5, ll. 21-22, page 21, line 4 to page 25, line 2)

a user input for enabling a user to submit a user identification input and a user request to a reporting system; (see, for example, FIGs. 1, 3, 9, and 10, '102,' '1010,' page 12, line 19 to page 14, line 15, page 22, ll. 8-10, page 26, ll. 3-16)

an identification module for identifying the user based on user identification input; and (see, for example, FIGs. 8-10, page 26, line 3 to page 27, line 22)

a centralized server for controlling access to at least one database (see, for example, FIG. 8, '820,' page 21, line 15 to page 23, line 2) wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition. (see, for example, FIGs. 8-10, page 21, line 15 to page 31, line 7).

D.   Concise Explanation of Independent Claim 13

Claim 13 recites a processor-readable medium comprising code for execution by a processor to implement database connection mapping for connecting a user to at least one database in a reporting system, the medium comprising: (see, for example, FIGs. 1-2, 8, page 5, ll. 21-22, page 21, line 4 to page 25, line 2)

code for causing a processor to enable a user to submit a user identification input and a user request to a reporting system; (see, for example, FIGs. 3 and 9, page 12, line 19 to page 14, line 15, page 22, ll. 8-10, page 26, ll. 3-16)

code for causing a processor to identify the user based on user identification input; and (see, for example, FIG. 9, page 26, line 3 to page 27, line 22)

code for causing a processor to control access to at least one database through a centralized server (see, for example, FIG. 8, '820,' page 21, line 15 to page 23, line 2) wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition. (see, for example, FIGs. 8-10, page 21, line 15-page 31, line 7).

VI.   Grounds Of Rejection To Be Reviewed On Appeal

The following grounds of rejection are to be reviewed on appeal:

- The rejection of claims 1-5 and 7-11 and 13-17 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 7,062,563 to Lewis *et al.* ("Lewis").

- The rejection of claims 6, 12, and 18 under 35 U.S.C. § 103(a) as allegedly being obvious over Lewis in view of U.S. Pat. App. Pub. No. 2001/0049717 to Freeman *et al.* ("Freeman").

VII.   Argument

The Office has failed to show: (1) that the claims are anticipated and (2) that the claims are obvious. Each of the specific claims and the impropriety of the rejections is addressed below.

A.   The Rejection Of Claims 1-5 And 7-11, And 13-17 Under 35 U.S.C. §102(e)

On pages 2-4, the Action rejects claims 1-5, 7-11, and 13-17 under 35 U.S.C. § 102(e) as allegedly being anticipated by Lewis. Appellant respectfully traverses this rejection.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished). Anticipation requires that a prior art reference disclose, either expressly or under the principles of inherency, each and every element of the claimed invention. Id. "In addition, the prior art reference must be enabling." Akzo N.V. v. U.S. International Trade Commission, 808 F.2d 1471, 1479, 1 USPQ2d 1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987). That is, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In re Donohue, 766 F.2d 531, 533, 226 USPQ 619, 621 (Fed. Cir. 1985). Such possession is effected only if one of ordinary skill in the art could have combined the disclosure in the prior art reference with his/her own knowledge to make the claimed invention. Id.

Claim 1 recites:

> A method for implementing database connection mapping for connecting a user to at least one database in a reporting system, comprising the steps of: enabling a user to submit a user identification input and a user request to a reporting system; identifying the user based on user identification input; and controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.

(Emphasis added.)

Regarding claim 1, the Examiner asserts that Lewis discloses the claimed invention. Appellant respectfully disagrees. In particular, Appellant respectfully submits that Lewis and the other cited references, taken either alone or in combination, fail to disclose, or even suggest, a

method or system for implementing database connection mapping which "enabl[es] a user to submit a user identification input and a user request to a reporting system," as presently claimed.

The Office fails to appreciate two key differences between the claimed invention and the references. For at least these differences, Lewis fails to anticipate claim 1.

1. Lewis fails to disclose "enabling a user to submit a user identification input and a user request to a reporting system"

The method of claim 1 "enabl[es] a user to submit a user identification input and a user request to a reporting system." Thus the user does not connect directly to the database and is not burdened with the implications of connecting directly to one or more databases.

The Office Action asserts that "enabling a user to submit a user identification input and a user request to a reporting system" is disclosed by Lewis, column 5, lines 49-60 and column 7 line 47 - column 8, line 5. *See* Office Action, page 3. Column 5, lines 49-60 recite:

> Databases (and other LDAP clients) refer to entries in the directory information system to determine enterprise user authorization at login. In an embodiment, the enterprise domain is associated with at least two types of objects: enterprise role objects and mapping objects. Enterprise role objects contain information about roles in the computing system. Mapping object contains mapping information between a full or partial distinguished name ("DN) in the directory information system and a user/schema name. Mapping objects are normally created for a particular domain. Mapping objects also reside under server objects, and are created for a particular database.

Clearly, there is no disclosure of "enabling a user to submit a user identification input and a user request **to a reporting system**." The cited disclosure of Lewis relates to databases referring to entries in a directory information system. At this point in time a user is already connected to a database. Lewis fails to disclose "enabling a user to submit a user identification input and a user request **to a reporting system**."

The Office further alleges that Lewis discloses "enabling a user to submit a user

identification input and a user request **to a reporting system**" in column 7, line 47 - column 8,

line 5. Column 7, line 47 - column 8, line 5 recites:

> Mapping objects comprise another object class useable in the
> invention. As described in more detail below, **these objects are
> used for schema assignments, to map enterprise users to local
> database schemas.** The mapping object contains the mapping of
> an enterprise DN and a native database username. According to an
> embodiment, the mapping object exists as a child of a server object
> or of an enterprise domain object. In an embodiment, the mapping
> object is a group object, where the CN attribute reflects the schema
> name and the members attribute contains all users who map to that
> schema. In an alternate embodiment, the mapping object is not a
> group object, where a native user attribute reflects the schema
> name and a distinguished name attribute contains the user
> identification that maps to a schema. An entry level mapping
> object according to an embodiment is an objectclass that contains a
> single mapping represented as two attributes: a full DN for an
> Enterprise User and a native username. A subtree-level mapping
> object is an objectclass that contains a single mapping represented
> as two attributes, e.g., a DN that does not necessarily represent an
> Enterprise User, and a native username. Only users under that DN
> in the directory tree will be mapped to the specified native user. If
> the DN itself is a user, then that user is not mapped to the native
> user. A full DN preferably takes precedence over a partial DN, and
> a mapping under the server takes precedence over one under that
> server's enterprise domain.

(Emphasis added). This cited portion of Lewis, at best, discloses mapping objects and how a

mapping object may be used to map an enterprise user to a schema, which is a subset of a

database. An enterprise user is simply "a user defined and managed in a directory information

system." *See* Lewis, column 3, lines 64-65. Thus, this citation similarly fails to disclose

"enabling a user to submit a user identification input and a user request to a reporting system."

Lewis clearly shows that a user connects to the database and **not** to a reporting system.

For example:

Accordingly, the present invention provides an improved method and system for managing access information for users and other entities in a distributed computing system. In an embodiment of the present invention, information relating to user access (e.g., name, authentication information, and user roles) is stored in a centralized directory. **When the user connects to the database, the database looks up the necessary information about the user in the directory.**

Lewis, column 1, lines 53-60, emphasis added. Lewis relates to authentication of a user when a user connects to a database. Note that the system of Lewis cannot disclose mapping a user to a database because "a database obtains a user's global roles when the user logs in. If a user's global roles change, those changes do not take effect until the next time the user logs in." *See* Lewis, column 4, lines 58-61.

In contrast to claim 1, Lewis discloses that when "a user at computer access device 106 seeks to access a first database 108 or a second database 110, 'authentication' information is communicated from access device 106 *to the respective database for which access is sought*" (emphasis added). See Lewis, FIG. 1; column 3, lines 6-10. The system of Lewis thus connects from the client's computer (computer access device 106) directly to the database. This does not provide the abstraction or flexibility of the present invention. This does not disclose "enabling a user to submit a user identification input and a user request **to a reporting system**." Thus, Lewis fails to disclose "enabling a user to submit a user identification input and a user request to a reporting system."

The specification illustrates the significance of the differences between "enabling a user to submit a user identification input and a user request **to a reporting system**" and a user connecting directly to a database. For example, the specification recites:

Database connection mapping may be implemented to provide control over data-level security. An abstraction layer between Business Intelligence (BI) users and database users may be implemented in accordance with the present invention. For

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> example, a BI user may log into a BI server and then be mapped to
> a defined database username and login so that the BI user does not
> need an additional database username and login. Users may be
> associated with one or more groups where groups may be mapped
> to database logins. In addition, database logins may be hidden from
> BI users so that BI users do not have a known account to the
> database.

Specification, page 2, lines 15 - 21. Business intelligence, as defined in the specification is a

type of reporting system. See, page 1, lines 5-6 ("[t]he present invention relates generally to

implementing security features for reporting systems, such as decision support, Business

Intelligence, on-line analytical processing and other systems ...."). Thus a user who "submit[s] a

user identification input and a user request to a reporting system" need not have a known account

to a database. Further illustration of the differences can be found in the specification at least at

page 21, lines 9 - 14, page 22, line 11 - page 23, line 2.

Thus for at least Lewis' failure to disclose "enabling a user to submit a user identification

input and a user request to a reporting system," Lewis does not anticipate claim 1.

**2.   Lewis fails to disclose "controlling access to at least one database
through a centralized server wherein the *centralized server maps the user to at
least one appropriate database based on the user request*."**

"[C]ontrolling access to at least one database through a centralized server wherein the

centralized server maps the user to at least one appropriate database based on the user request"

is not disclosed by Lewis.

The Office Action asserts that "controlling access to at least one database through a

centralized server wherein the centralized server maps the user to at least one appropriate

database based on the user request and at least one database connection definition" is disclosed

by Lewis. Specifically, the Office asserts that it is disclosed by column 7, line 47 - column 8, line 5 and by column 10, lines 37-52. As explained above, column 7, line 47 - column 8, line 5 relate to "objects [which] are used for schema assignments, to map enterprise users to local database schemas." *See*, column 7, lines 49 -50. As further explained above, the cited portion of Lewis, at best, discloses mapping objects and how a mapping object may be used to map an enterprise user to a schema, which is a subset of a database. **"Mapping objects** also reside under server objects, and **are created for a particular database."** *See* column 5, lines 58-59, emphasis added. Mapping objects are created for a particular database therefore a mapping object cannot map a user to an appropriate database because it belongs to one database in particular. A mapping object, at best, maps a user to a schema **within** a database (which the user is already connected to), not to the database. Thus, the cited portion of Lewis fails to disclose "controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition."

The second citation by the Office similarly fails to disclose "controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition." The second cited portion of Lewis, column 10, lines 37-52 recites:

> An" alternate linking approach is to use "fixed user" or "named" links. Unlike a connected-user link, a named link contains both the connect string and the appropriate user credentials (e.g., username/password or other authentication information) for the relevant account on the remote server. Thus, **named links allow a user on a first database to execute a procedure at a second database using the security context of another user**. The drawback to this approach is that providing this authentication information in a named link creates a potential security problem, since the authentication information may become available to

> unauthorized users or administrators that have access to the named
> link on either the source or target databases. Encrypting the
> password information is not an optimal solution since management
> and transmission of encryption keys between databases provides
> another potential source of security failure.

(Emphasis added). This cited portion of Lewis, at best, discloses connecting from one database

to another. A "user on a first database" is a user who is already mapped to a database, not a user

who is being mapped to "at least one appropriate database based on the user request and at least

one database connection definition." Furthermore, "execut[ing] a procedure at a second database

using a security context of another user" is not "controlling access to at least one database

through a centralized server wherein the centralized server maps the user to at least one

appropriate database based on the user request and at least one database connection definition."

On the contrary, the named link contains the user name and password of the other user to execute

the stored procedure. This is not access controlled through a centralized server. At best this is

access through a database procedure using a stored username and password. The named link will

not map to "at least one appropriate database based on the user request and at least one database

connection definition." The named link will always connect to the same database utilizing a

"connect string and the appropriate user credentials (e.g., username/password or other

authentication information)."

 Additionally, Lewis teaches away from using a named link for controlling access to a

database. "The drawback to this approach is that providing this authentication information in a

named link creates a potential security problem, since the authentication information may

become available to unauthorized users or administrators that have access to the named link on

either the source or target databases." Thus, Lewis teaches that named links are a potential

security problem, not a method of "controlling access." For at least these reasons the second

citation to Lewis fails to disclose "controlling access to at least one database through a

centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition."

The Office cites additional portions of Lewis. The arguments based on these additional cited portions continue to confuse the mapping of a user by a centralized server to a database, with the mapping by a user to a database itself. The Office cites Lewis' disclosure of a user desiring to access databases DB1 and DB2. *See* Action, page 2. In particular, the Office cites column 3, lines 50-67. In the cited portion of Lewis, a "user 314 (Anne Smith") at a first access device 320 and a second user 316 ("Tom Jones) at a second access device 322 seek to access databases DB1 and DB2." A user seeking access to a database does not disclose or suggest "controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition." In the cited portion of Lewis, a user is already mapped to the database and is seeking authorization to the database. Lewis, at best, is directed toward centralizing the scope of privileges and does not provide a disclosure of mapping a user to an appropriate database. This is clarified in the paragraph prior to the cited portion. "Authorization and/or authentication information for users in the distributed computer system can be centrally stored and maintained in the directory information system 104." *See*, Lewis, column 3, lines 35 - 47.

The Office also cites Lewis' disclosure of a mechanism "for providing connection links as a current user from a first database to a second database without requiring explicit transmission of authentication credentials in the network link between the databases." *See* Action, page 2, citing Lewis, col. 10, ll. 53-58. Connection links providing access from a first database to a second database is not a disclosure of "controlling access to at least one database through a,

centralized server wherein the centralized server maps the user to at least one appropriate

database based on the user request and at least one database connection definition."

The Office Action continues to ignore the importance of the difference between a

centralized server mapping the user to a database in contrast to a user mapping to a database

directly or a database using static credentials to connect to a second database. The specification

clearly illustrates the significance of this difference.

> As database connectivity is handled by **centralized server**,
> centralized control of database access may be achieved. Various
> advantages of centralized control may be realized. For example, as
> the server establishes and maintains database connectivity, the
> need to rely on identically configured connections on client and
> server machines may be eliminated. This makes it easy to set up,
> deploy and manage large systems. In addition, the centralized
> control of the present invention further provides connection
> caching enabling the server to reuse database connections thereby
> minimizing the overhead associated with repeated connecting to
> and disconnecting from databases. Load balancing may also be
> achieved because the server may ensure that no single database
> becomes overloaded with user requests. The server may also map
> users to database logins thereby allowing multiple users to access
> the database using a single database login.

Specification, page 3, lines 3-13. Additional illustrations in the specification can be found at

least at page 13, lines 18-22 and page 22, 11 - page 23, line 2.

Clearly, a first database which consistently maps to the same secondary database, as is

done in Lewis, does not disclose mapping by a centralized server which may enable the above

advantages. Additionally, connecting from a user device to a database and subsequently

accessing a server to authenticate or to determine access to a schema of the database, as is done

in Lewis, is not a disclosure of mapping by a centralized server to a database.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima

facie case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished).

Anticipation requires that a prior art reference disclose, either expressly or under the principles

of inherency, each and every element of the claimed invention. Id. Lewis does not disclose each and every element of the claimed invention. Thus the Office has failed to establish a prima facie case of anticipation. Accordingly, for at least the foregoing reasons, Lewis does not anticipate claim 1 under 35 U.S.C. § 102(e) and Appellants respectfully request that the rejection of claim 1 be reversed.

The rejection of claims 2-5, 7-11, and 13-17 also fails for reasons analogous to those given in support of claim 1.

In view of the foregoing, it is respectfully requested that the aforementioned rejections be reversed.

B.   Claim 2 is Separately Patentable

The Action rejects claim 2 under 35 U.S.C. § 102(e) as allegedly being anticipated by Lewis. Appellants respectfully traverse.

Claim 2 is allowable over Lewis for the reasons set forth above due to its dependency on claim 1. Claim 2 is also allowable for at least the two reasons set forth below.

First, Lewis does not disclose "wherein the database connection definition comprises a data source name and a set of properties for *establishing a database connection* to at least one database" (emphasis added), as recited in claim 2. Claim 1 recites that "the centralized server maps the user to at least one appropriate database based on the user request **and** *at least one database connection definition*" (emphasis added), as recited in claim 1. Thus, the claimed centralized server maps a user to at least one appropriate database based on a user request and at least one database connection definition, which comprises a data source name and a set of properties for establishing a database connection to at least one database.

Lewis clearly fails to anticipate claim 2 because Lewis fails to disclose any such database

connection definition for establishing a database connection to at least one database. To reject these claim features, the Action cites column 10, lines 37-52 of Lewis. These cited lines disclose "named links," which contain both a "connect string and the appropriate user credentials . . . for the relevant account on the remote server" and "allow a user on a first database to execute a procedure at a second database using the security context of another user." *See* Lewis, col. 10, ll. 38-44. Lewis also discloses that "the user at the first database may create a procedure or function with an *embedded linking operation* that performs one or more operations at the second database." *See* Lewis, col. 9, ll. 58-60. Thus, the links disclosed in Lewis are <u>between databases 108 and 110</u>, not between the directory information system 104 and the databases 108 or 110. Hence, the *directory information system 104* is not mapping a user of the computer access device 106 to either database 108 or 110 based on the named links. Therefore, Lewis does not disclose that the *directory information system 104* maps a user of the computer access device 106 to either database 108 or 110 based on at least one named link, which comprises a data source name and a set of properties for establishing a database connection to database 108 or 110.

Second, Lewis does not disclose that the directory information system 104 maps a user to database 108 or 110 based on named links that include a set of properties *for establishing a database connection* to at least one database. Instead, Lewis discloses that the user of the computer access device 106 communicates authentication information to "the respective database for which access is sought." *See* Lewis, col. 3, ll. 6-10. Then, the "centralized directory information system 104 communicates with each database 108 and 110 to authenticate users that seek to access any of the databases serviced by the centralized directory information system 104." *See* Lewis, col. 3, ll. 20-24.

In other words, the computer access device 106 of Lewis has *already* identified the

database (e.g., database 108 or 110) to which access is sought and has established a connection with this database *before* the directory information system 104 communicates with either the database 108 or 110 to authenticate the user. *See* Lewis, col. 3, ll. 6-26. Hence, Lewis does not disclose that the directory information system 104 maps the user to a database based on named links that include a set of properties *for establishing a database connection* to database 108 or 110. Thus, Lewis does not disclose a centralized server that maps a user "to at least one appropriate database based on the user request **and** *at least one database connection definition*" (emphasis added) (*see* claim 1), "wherein the database connection definition comprises a data source name and a set of properties for *establishing a database connection* to at least one database" (emphasis added), as recited in claim 2. Therefore, claim 2 is also allowable over Lewis and is in condition for allowance for reasons independent of the allowability of claim 1.

Claims 8 and 14 also are independently in condition for allowance for reasons analogous to those given in support of claim 2.

C.   The Rejection Of Claims 6, 12, And 18 Under 35 U.S.C. § 103(a)

On page 4, the Action rejects claims 6, 12, and 18 under 35 U.S.C. § 103(a) as allegedly being obvious over Lewis in view of U.S. Pat. App. Pub. No. 2001/0049717 to Freeman *et al.* ("Freeman"). Appellants respectfully traverse.

Claims 6, 12, and 18 respectively depend from claims 1, 7, and 13, which are in condition for allowance. Accordingly, claims 6, 12, and 18 also are in condition for allowance and reversal of the aforementioned rejections is respectfully requested.

Therefore, claims 1-18 are in condition for allowance and reversal of the rejections of claims 1-18 is respectfully requested.

VIII. Conclusion

Because the cited reference fails to disclose or render obvious all features set forth in the pending claims, Appellants submit that the pending claims are allowable over the cited reference. Accordingly, Appellants respectfully request that the Board reverse the prior art rejections set forth in the Action, and allow all of the pending claims. Authorization is hereby granted to charge or credit the undersigned's Deposit Account No. 50-0206 for any fees or overpayments related to the entry of this Appeal.

Respectfully submitted,

Date: _Dec 21, 2007_   By: _____
                                             Brian Buroker
                                             Registration No. 39,125

Hunton & Williams
1900 K. St., NW, Suite 1200
Washington, D.C. 20006-1109
(202) 955-1894

IX.   Claims Appendix

1 .   A method for implementing database connection mapping for connecting a user to at least one database in a reporting system, comprising the steps of:

enabling a user to submit a user identification input and a user request to a reporting system;

identifying the user based on user identification input; and

controlling access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.

2 .   The method of claim 1 wherein the database connection definition comprises a data source name and a set of properties for establishing a database connection to at least one database.

3 .   The method of claim 2 wherein the data source name comprises information for locating and logging into a database.

4 .   The method of claim 2 wherein the database connection comprises a physical open database connectivity connection to a database.

5 .   The method of claim 1 wherein the user is associated with a group of users where each user of the group is mapped to a database connection via a database login.

6 .   The method of claim 1 further comprising the step of load balancing query volume associated with the at least one database.

7 .   A system for implementing database connection mapping for connecting a user to at least one database in a reporting system, comprising:

a user input for enabling a user to submit a user identification input and a user request to a reporting system;

an identification module for identifying the user based on user identification input; and

a centralized server for controlling access to at least one database wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.

8. The system of claim 7 wherein the database connection definition comprises a data source name and a set of properties for establishing a database connection to at least one database.

9. The system of claim 8 wherein the data source name comprises information for locating and logging into a database.

10. The system of claim 8 wherein the database connection comprises a physical open database connectivity connection to a database.

11. The system of claim 7 wherein the user is associated with a group of users where each user of the group is mapped to a database connection via a database login.

12. The system of claim 7 further comprising a load balancing module for load balancing query volume associated with the at least one database.

13. A processor-readable medium comprising code for execution by a processor to implement database connection mapping for connecting a user to at least one database in a reporting system, the medium comprising:

code for causing a processor to enable a user to submit a user identification input and a user request to a reporting system;

code for causing a processor to identify the user based on user identification input; and

code for causing a processor to control access to at least one database through a centralized server wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.

14. The medium of claim 13 wherein the database connection definition comprises a data source name and a set of properties for establishing a database connection to at least one database.

15. The medium of claim 14 wherein the data source name comprises information for locating and logging into a database.

16. The medium of claim 14 wherein the database connection comprises a physical open database connectivity connection to a database.

17. The medium of claim 13 wherein the user is associated with a group of users where each user of the group is mapped to a database connection via a database login.

18. The medium of claim 13 further comprising code for causing a processor to load balance query volume associated with the at least one database.

X.   Evidence Appendix

None.

XI.   Related Proceedings Appendix

None.